



Dockets Management Branch
Food and Drug Administration
HFA 305
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

15 April 1999

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RE: FDA Docket No. 98O-0504/NESGD Comments

We have reviewed the proposed performance standards for addressing the *Vibrio* issue in bivalve shellfish, as requested in the petition of the Center for Science in the Public Interest (CSPI). This petition is replete with technical errors, distortion of fact and contorted logic. The approach of the CSPI places great emphasis on emotional and sensationalistic aspects of the issue, but it is patently deficient in scientifically supportable evidence.

We have examined the statement prepared by the northeastern shellfish growers and dealers in response to your request for comments on the petition, and we agree fully with the conclusions of the NESGD.

As an association representing aquaculture producers in New Jersey, we support the effort of the NESGD to foster a rational, non-emotional approach to resolving the health issues associated with the consumption of raw bivalve shellfish. We also wish to indicate our deepest concern that the CSPI has attempted to coerce the FDA into a position of taking unilateral action that would circumvent the ISSC/NSSP process; such action would be quite inappropriate and would seriously compromise the cooperative programme that has proven to be an effective mechanism for addressing shellfish sanitation issues.

Sincerely,

W.J. Canzonier
President NJAA

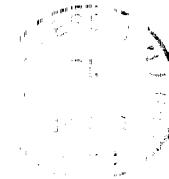
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ISSC

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1623 Whitesville Rd. Toms River, N.J. 08755



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20852+0001

